

1 TROUTMAN SANDERS LLP
2 Anna Jane I. Zarndt
3 Nevada Bar Number 10809
4 TROUTMAN SANDERS LLP
5 222 Central Park Avenue, Ste. 2000
6 Virginia Beach, VA 23462
7 Telephone: (757) 687-7753
8 Facsimile: (757) 687-7510
9 Email: annajane.zarndt@troutmansanders.com

10 *Attorney for PHH MORTGAGE CORPORATION*

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 MICHAEL J. STACK,

14 Plaintiff,

15 v.

16 EQUIFAX INFORMATION SERVICES,
17 LLC, FLAGSTAR BANK; LOANCARE
18 SERVICING CENTER; PHH
19 MORTGAGE SERVICE,

20 Defendants.

Case No. 2:19-cv-01720-GMN-VCF

21 **STIPULATION AND ORDER TO**
22 **EXTEND TIME TO FILE**
23 **RESPONSIVE PLEADING TO**
24 **COMPLAINT**

25 **[FIRST REQUEST]**

26 Plaintiff Michael J. Stack (“Plaintiff”), by and through his counsel, and
27 Defendant PHH Mortgage Corporation (“PHH”) (collectively the “Parties”), by
28 and through its counsel, agree and stipulate as follows:

IT IS HEREBY STIPULATED that PHH shall have up to and including
December 9, 2019 within which to file its response to Plaintiff’s Complaint:

1. PHH was served on October 7, 2019.

1 2. Without having realized that service of the Complaint was effectuated,
2 the Parties agreed to waive service and filed the same with the Court on October 8,
3 2019. [ECF No. 5].
4

5 3. The Parties are engaged in early settlement discussions.
6

7 4. The Parties expect to determine within the near future whether this
8 action can be resolved at this early stage.

9 4. This is the first stipulation for an extension of time to respond to the
10 Complaint, and this request is not being made for purposes of delay or any other
11 improper reason.
12

13 STIPULATED and AGREED to this 14th day of October 2019.
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

/s/ Anna Jane I. Zarndt

Anna Jane I. Zarndt

Nevada Bar Number 10809

TROUTMAN SANDERS LLP

222 Central Park Avenue, Ste. 2000

Virginia Beach, VA 23462

Telephone: (757) 687-7753

Facsimile: (757) 687-7510

Email:

annajane.zarndt@troutmansanders.com

*Attorney for PHH MORTGAGE
CORPORATION*

/s/ Shawn W. Miller

Shawn W. Miller

David H. Krieger

Haines & Krieger, LLC

8985 S. Eastern Avenue, Suite 350

Henderson, Nevada 89123

Phone: (702) 880-5554

FAX: (702) 385-5518

dkrieger@hainesandkrieger.com

*Attorneys for Plaintiff MICHAEL J.
STACK*

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

IT IS HEREBY ORDERED that Defendant PHH MORTGAGE CORPORATION shall have up to and including **December 9, 2019** within which to file its response to Plaintiff's Complaint.

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2019, I served a true and correct copy of this **STIPULATION AND ORDER TO EXTEND TIME TO FILE RESPONSIVE PLEADING TO COMPLAINT** upon all counsel of record by using the United States District Court, District of Nevada's Case Management/Electronic Case Filing System that will electronically mail notification to all parties appearing in this case.

Shawn W. Miller, Esq.
David H. Krieger, Esq.
Haines & Krieger, LLC
8985 S. Eastern Avenue, Suite 350
Henderson, Nevada 89123
Phone: (702) 880-5554
FAX: (702) 385-5518
dkrieger@hainesandkrieger.com
Attorneys for Plaintiff

/s/ Anna Jane I. Zarndt
Anna Jane I. Zarndt